

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

SHAINY HARPOLE, Individually and on)
behalf of HOLLIE GROTE deceased)
)
Plaintiff,) Case No. 2:23-cv-00068-RLW
)
v.)
)
Pike County, Missouri, et al.)
)
Defendants.)

MOTION FOR DISCOVERY CONFERENCE

COME NOW, Defendants Pike County, Missouri, Pike County Sheriff's Department, Sheriff Stephen Korte, and Corina Halbach (hereinafter collectively referred to as "the Pike County Defendants"), by and through the undersigned counsel, and hereby request a discovery conference with the Court by telephone today, May 29, 2025 between 3:00 p.m. and 5:00 p.m. At issue is the deposition of Defendant Corina Halbach, currently scheduled for May 30, 2025 at 10:30 a.m. Plaintiff recently deposed Defendant Sheriff Stephen Korte wherein Plaintiff asked Defendant Korte a line of questions related to an active criminal investigation previously conducted by the Pike County Sheriff's Department and now being conducted by the Missouri Highway Patrol on a matter wholly unrelated to this case. In response to certain of these questions, Sheriff Korte invoked his Fifth Amendment right against self-incrimination. Plaintiff's counsel subsequently released portions of the transcript and/or video of Sheriff Korte's deposition reflecting Sheriff Korte invoking his Fifth Amendment right to local media, including the St. Louis Post-Dispatch and Fox 2 News, both of whom published stories attacking Sheriff Korte's character, reputation and credibility.

The Pike County Defendants are hesitant to produce Ms. Halbach for deposition without parameters in place to prevent any further dissemination of deposition testimony on the same topic

to local media outlets for public consumption as the Pike County Defendants believe that any such dissemination contaminates the jury pool and prejudices the Pike County Defendants' right to an impartial trial. The Pike County Defendants seek the Court's input as to whether any such parameters should be followed during Ms. Halbach's deposition. Counsel for the Pike County Defendants and counsel for Plaintiff have exchanged emails on this issue and it appears highly unlikely that the Parties will be able to reach a consensus on any such parameters prior to Ms. Halbach's deposition without input from the Court. Plaintiff's counsel indicated in an earlier email to the undersigned that he is in motion hearings and a deposition today that will last until approximately 3:00 p.m. Due to the press of time and Plaintiff's counsel's schedule, the Pike County Defendants are filing this motion separately and sending copies via email to Plaintiff's counsel as well as counsel for the other Defendants in this matter.

BARKLAGE, BRETT & HAMILL, P.C.

/s/ Bryon E. Hale

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